

# Composite

# Exhibit D

**PLAINTIFFS' OMNIBUS MOTION TO LIFT DISCOVERY STAY  
AND FOR LEAVE TO CONDUCT JURISDICTIONAL DISCOVERY,  
AND, IF NECESSARY TO AMEND THEIR COMPLAINTS WITH  
ANY FACTS ARISING FROM SUCH DISCOVERY**

(Part 1 of 3)

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
MDL No. 3076  
CASE NO. 1:23-md-03076-KMM**

In Re: FTX Cryptocurrency Exchange Collapse Litigation

**PLAINTIFFS' SECOND SET OF INTERROGATORIES TO DEFENDANTS  
HASLEM, CURRY, DAVID, GOLDEN STATE WARRIORS, OSAKA, SOLOMID  
CORPORATION, STEPHAN, JIKH, KULLBERG, SINGH, JUNG, LEFEBVRE,  
AND CREATORS AGENCY, LLC**

Plaintiffs, pursuant to Fed. R. Civ. P. 26 and 33, and Rule 26.1 of the Local Rules of the Southern District of Florida, request that Defendants Udonis Haslem, Stephen Curry, Naomi Osaka, Lawrence Gene David, Solomid Corporation, Golden State Warriors, LLC, Graham Stephan, Andrei Jikh, Erika Kullberg, Jaspreet Singh, Brian Jung, Jeremy Lefebvre, and Creators Agency, LLC, respectively respond, in writing and under oath, to the following interrogatories, within the time prescribed by such rules.

Respectfully submitted on November \_\_\_, 2023.

Plaintiffs' Co-Lead Counsel	
<u>By: /s/ Adam Moskowitz</u> Adam M. Moskowitz Florida Bar No. 984280 Joseph M. Kaye Florida Bar No. 117520 <b>THE MOSKOWITZ LAW FIRM, PLLC</b> Continental Plaza 3250 Mary Street, Suite 202 Coconut Grove, FL 33133 Office: (305) 740-1423 adam@moskowitz-law.com joseph@moskowitz-law.com service@moskowitz-law.com	<u>By: /s/ David Boies</u> David Boies Alex Boies Brooke Alexander <b>BOIES SCHILLER FLEXNER LLP</b> 333 Main Street Armonk, NY 10504 Office: (914) 749-8200 dboies@bsfllp.com aboies@bsfllp.com balexander@bsfllp.com

Committee Members	
K. Rachel Lanier Alex J. Brown <b>The LANIER LAW FIRM, P.C.</b> 10940 W. Sam Houston Pkwy N Houston, TX 77064 Telephone: (713) 659-5200 Facsimile: (713) 659-2204 Rachel.Lanier@lanierlawfirm.com Alex.Brown@lanierlawfirm.com	Barbara C. Lewis Florida Bar No. 118114 <b>THE MOSKOWITZ LAW FIRM, PLLC</b> Continental Plaza 3250 Mary Street, Suite 202 Coconut Grove, FL 33133 Office: (305) 740-1423 Barbara@moskowitz-law.com

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on November \_\_\_, 2023, a true and correct copy of the foregoing was served via email to all counsel of record.

By: /s/ Adam Moskowitz  
Adam M. Moskowitz

## **DEFINITIONS**

Unless otherwise specified, the terms set forth below have the following meanings:

1. “FTX Entities” refers to FTX Trading and/or FTX US.
2. “FTX Trading” refers to FTX Trading Ltd. d/b/a FTX Trading, including, but not limited to, its past and present subsidiaries, affiliates, divisions, segments (including any mobile application and/or web-based cryptocurrency investment services or trading platform, such as FTX.com), predecessors (including acquired entities or lines of business such as Blockfolio, Inc.), successors, directors, officers, employees, representatives and/or agents.
3. “FTX US” refers to West Realm Shires Services Inc. d/b/a FTX US, including, but not limited to, its past and present subsidiaries, affiliates, divisions, segments (including any mobile application and/or web-based cryptocurrency investment services or platform, such as FTX.com), predecessors (including acquired entities or lines of business such as Blockfolio, Inc.), successors, directors, officers, employees, representatives and/or agents.
4. “FTX Platform” refers to the FTX Entities’ mobile application and/or web-based cryptocurrency investment service that places cryptocurrency trade orders on behalf of users.
5. “Person” or “People” refers to any natural person(s) or any business, legal, or governmental entity (or entities) or association(s).
6. “Alameda” refers to Alameda Research LLC, including, but not limited to, its past and present subsidiaries, affiliates, divisions, segments (including any mobile application and/or web-based cryptocurrency investment services or trading platform), predecessors (including acquired entities or lines of business), successors, directors, officers, employees, representatives and/or agents.
7. All/Each and And/Or – The terms “all”, “each”, “and” and “or” shall be construed as meaning either all or each as necessary, or conjunctively, to bring within the scope of the discovery request all responses that might otherwise be construed to be outside its scope.

8. “FTT” refers to the native cryptocurrency exchange token of the FTX Platform ecosystem.

9. “Communication” refers to the transmittal of information in the form of facts, ideas, inquiries or otherwise, and whether orally or in writing, or by any other means or medium, including in person, electronically and/or by exchange or communication of any document.

10. “Concerning” means relating to, referring to, describing, evidencing or constituting.

11. “Defendants” refers to any and all persons and/or entities named as defendants in any of the actions consolidated with, and into, the above-captioned action. For purposes of these Requests, Defendants also includes Silvergate Capital Corporation (a/k/a Silvergate Bank).

12. “Document” refers to any written, printed, typed or other graphic matter, of any kind or nature, whether in hard copy or electronic format, whether the original, draft, or a copy and copies bearing notations or marks not found on the original, including, but not limited to, memoranda, reports, recommendations, notes, letters, envelopes, post-its, emails, text messages, instant messages (including, but not limited to, messages exchanged or sent using Slack, Teams, Discord, WhatsApp, Signal or any other similar application), transcripts, studies, analyses, tests, books, articles, minutes, agreements, contracts, and all other written communications, of any type, including inter and intra-office communications, questionnaires, surveys, charts, graphs, videos, photographs, tapes, voice messages or other recordings, print-outs or compilations from which information can be obtained or, if necessary, translated through detection devices into reasonably usable form, including all underlying or preparatory materials and drafts thereof. To the extent not already covered in the above

definition, “Document” specifically includes any “writing”, “recording”, “photograph”, “original” or “duplicate” as defined in Rule 1001 of the Federal Rules of Evidence, and/or “Electronically Stored Information” as set forth in Rule 34 of the Federal Rules of Civil Procedure and/or as further defined as “ESI” herein.

13. “ESI” refers to Electronically Stored Information, as consistent with Rule 34 of the Federal Rules of Civil Procedure, and includes all computer or electronically stored or generated data and information, including all attachments to and enclosures within any requested item, and all drafts thereof. ESI includes all information and documents stored in any format and on any storage media, including, but not limited to: hard disks; optical disks, floppy disks; flash memory drives; and magnetic tape, whether fixed, portable or removable, and ESI further includes, but is not limited to, electronic spreadsheets, electronic presentation documents, e-mail messages, text messages, instant messages (including, but not limited to, message exchanged or sent using Slack, Teams, Discord, WhatsApp, Signal or any other similar application); image files; sound files; material or information stored in a database or accessible from a database. ESI also includes all associated metadata that is maintained or saved (including for example, author, recipient, file creation date, file modification date, etc.).

14. “You” or “Your” shall refer to the defendant responding to these requests, including, but not limited to, its international, national or local branches or offices, and current and prior partners, employees and agents.

15. Whenever a reference to a business entity appears, the reference shall mean the business entity, its affiliated companies, partnerships, divisions, subdivisions, directors, officers, employees, agents, clients or other representatives of affiliated third parties.

16. Defined terms may or may not be capitalized or made uppercase; the given definitions apply even if a term in question is not capitalized or made uppercase. No waiver of a definition is implied by the use of a defined term in a non-capitalized or lowercase form.

### **INSTRUCTIONS**

1. Production of responses and objections to the interrogatories shall be made at the offices of The Moskowitz Law Firm, P.O. Box 653409, Miami, FL 33133, or via electronic mail to the email addresses provided in the signature blocks of the attorneys serving these interrogatories.

2. Unless otherwise stated in an interrogatory, the time period for which you must respond is January 1, 2019 through the date of response to these interrogatories.

3. These interrogatories shall include all information in your possession, custody or control or in the possession, custody or control of your present or former agents, representatives, or your attorneys, or any and all persons acting on your behalf, or your present or former agents, representatives, or attorneys.

4. Each interrogatory objection and/or response must immediately follow the quoted interrogatory, and no part of an interrogatory shall be left unanswered merely because an objection is interposed to another part of the interrogatory.

5. If you claim there is any ambiguity in either a particular interrogatory or in a definition or an instruction applicable thereto, you shall not use such claim as a basis for refusing to respond to the interrogatory, but you shall set forth as part of the response the language you deem ambiguous and the interpretation you used in responding.

6. Where an objection is made to any interrogatory, the objection shall state with specificity all grounds. Any ground not stated in an objection within the time provided by the Federal Rules of Civil Procedure, the local rules of the Southern District of Florida, or by the Court's order, or any extensions thereof, shall be waived.

7. Where a claim of privilege or protection from disclosure is asserted in objecting to any interrogatory, or sub-part thereof, and a complete answer is not provided on the basis of such assertion, you shall provide a log within the time period set forth in Rule 26.1 of the Local Rules of



the Southern District of Florida, and in conformity with the requirements of that rule.

8. If you answer any interrogatory by reference to records or materials from which the answer may be derived or ascertained, you shall make available within the time period specified in Rule 26.1 of the Local Rules of the Southern District of Florida:

- (A) any electronically stored information or summaries thereof that you have or can adduce by a relatively simple procedure, unless those materials are privileged or otherwise immune from discovery.
- (B) any relevant compilations, abstracts or summaries in your custody or readily obtainable by you, unless those materials are privileged or otherwise immune from discovery.

9. If any documents are produced in connection with responding to any interrogatory, such documents are to be produced in the following method:

- a. Single page .TIFF
- b. Color .jpg (documents wherein reflection of importance relies on color, shall be produced in .jpg format)
- c. OCR at document level (all documents are to be provided with searchable text files with the exception of the redacted portions of redacted documents).
- d. Electronic documents, e-mails, text or instant messages are to be processed and converted from the electronic format to single page tiff.

10. These interrogatories shall be deemed continuing, and supplemental interrogatory responses shall be provided as additional responsive information becomes available.

### **INTERROGATORIES**

#### **For All Defendants:**

1. State whether you are authorized to do business in Florida and provide the date of issuance and nature of such authorization.
2. Identify each contract you have entered with any person or entity in Florida and provide the nature and dates of each said contract.
3. State all business you conduct or have conducted within Florida during the past three years, including the number of employees and/or agents located in Florida and any subsidiary entities located in Florida.
4. List any communication(s) you had to, from, or in Florida (whether written or oral) with any individual or entity for the purpose of conducting business for you or on your behalf.
5. State each occasion in which you travelled to Florida and the purpose and dates of such travel.
6. State the existence and nature of any regular sales You have within Florida.
7. List all advertising activity directed towards Florida.
8. State the location/address of any bank, credit union, or other financial institution at which you maintain account(s) in Florida.
9. State whether you have paid state income tax in Florida in the last three years.

#### **For Defendant Erika Kullberg:**

10. State your full legal name and any aliases you have.
11. State your domicile and your current residence address.
12. State all residence addresses you have resided in and the address(es) at which you have received mail.

13. State the address(es) shown on your driver's license and any professional license(s).

14. State the address(es) of any business(es) you own or operate in the United States.

15. State each location in which you are licensed or otherwise authorized to do business and provide the date of issuance.

16. State any previous names or aliases.

17. List any and all dates for which you have either visited, lived, or resided at 40 Waterside Plz, Apt. 11D, New York, New York 10010.

18. State whether you have ever leased a residence under the name "Erika Nicole Shannon."

19. State all addresses for which you have entered into a lease using the name "Erika Nicole Shannon" or "Erika Kullberg."

20. State how you became aware of the service attempt on April 6, 2023 at 40 Waterside Plz, Apt. 11D, New York, New York 10010.

21. State whether you received any telephone calls from an individual purporting to be a front desk worker or security for an apartment building on April 6, 2023.

22. State how you know Arzu Malik.

23. State how you became aware that you were named as a Defendant in the above-captioned case.

**VERIFICATION**

\_\_\_\_\_  
**SIGNATURE**

STATE OF \_\_\_\_\_ )  
 ) SS:  
COUNTY OF \_\_\_\_\_ )

BEFORE ME, the undersigned authority, personally appeared \_\_\_\_\_  
[ ] personally known to me or [ ] who produced identification of \_\_\_\_\_,  
who after being first duly sworn, deposes and states that he executed the foregoing and that it is true  
and correct.

SWORN TO AND SUBSCRIBED BEFORE ME this \_\_\_\_ day of \_\_\_\_\_, 2023.

[Seal]

\_\_\_\_\_  
Notary Public

\_\_\_\_\_  
Print Name

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
MDL No. 3076  
CASE NO. 1:23-md-03076-KMM**

In Re: FTX Cryptocurrency Exchange Collapse Litigation

**NOTICE OF TAKING THE VIDEOTAPED DEPOSITION OF  
DEFENDANT ANDREI JIKH**

Pursuant to Federal Rule of Civil Procedure 30, Plaintiffs' counsel will take the deposition of the below-named person/entity on the date, time, and at the location indicated.

**DEPONENT:** Defendant Andre Jikh  
**DATE:**  
**TIME:**  
**LOCATION:** Zoom (contact counsel for details)

The aforesaid deposition will be before a court reporter, an officer authorized by law to administer oaths and take depositions in the State of Florida. The deposition is being taken for the purpose of discovery, for use at trial, or both, or for such other purposes as are permitted under the Federal and Local Rules of Civil Procedure.

Respectfully submitted on November \_\_\_, 2023.

<b><u>Plaintiffs' Co-Lead Counsel</u></b>	
<u>By: /s/ Adam Moskowitz</u> Adam M. Moskowitz Florida Bar No. 984280 Joseph M. Kaye Florida Bar No. 117520 <b>THE MOSKOWITZ LAW FIRM, PLLC</b> Continental Plaza 3250 Mary Street, Suite 202 Coconut Grove, FL 33133 Office: (305) 740-1423 adam@moskowitz-law.com joseph@moskowitz-law.com service@moskowitz-law.com	<u>By: /s/ David Boies</u> David Boies Alex Boies Brooke Alexander <b>BOIES SCHILLER FLEXNER LLP</b> 333 Main Street Armonk, NY 10504 Office: (914) 749-8200 dboies@bsfllp.com aboies@bsfllp.com balexander@bsfllp.com

<b><u>Plaintiffs' Promoter Committee Members</u></b>	
Barbara C. Lewis Florida Bar No. 118114 <b>THE MOSKOWITZ LAW FIRM, PLLC</b> Continental Plaza 3250 Mary Street, Suite 202 Coconut Grove, FL 33133 Office: (305) 740-1423 barbara@moskowitz-law.com service@moskowitz-law.com	K. Rachel Lanier Alex Brown <b>THE LANIER LAW FIRM, P.C.</b> 10940 W. Sam Houston Pkwy N. Houston, TX 77064 Telephone: (713) 659-5200 Rachel.Lanier@lanierlawfirm.com Alex.Brown@lanierlawfirm.com

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on November \_\_\_, 2023, a true and correct copy of the foregoing was served via email to all counsel of record.

By: /s/ Adam M. Moskowitz  
Adam M. Moskowitz

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

MDL No. 3076  
CASE NO. 1:23-md-03076-KMM

In Re: FTX Cryptocurrency Exchange Collapse Litigation

**NOTICE OF TAKING THE VIDEOTAPED DEPOSITION OF**  
**DEFENDANT BRIAN JUNG**

Pursuant to Federal Rule of Civil Procedure 30, Plaintiffs' counsel will take the deposition of the below-named person/entity on the date, time, and at the location indicated.

**DEPONENT:** Defendant Brian Jung

**DATE:**

**TIME:**

**LOCATION:** Zoom (contact counsel for details)

The aforesaid deposition will be before a court reporter, an officer authorized by law to administer oaths and take depositions in the State of Florida. The deposition is being taken for the purpose of discovery, for use at trial, or both, or for such other purposes as are permitted under the Federal and Local Rules of Civil Procedure.

Respectfully submitted on November \_\_\_, 2023

**Plaintiffs' Co-Lead Counsel**

By: /s/ Adam Moskowitz  
Adam M. Moskowitz  
Florida Bar No. 984280  
Joseph M. Kaye  
Florida Bar No. 117520  
**THE MOSKOWITZ LAW FIRM, PLLC**  
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By: /s/ David Boies  
David Boies  
Alex Boies  
Brooke Alexander  
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<b><u>Plaintiffs' Promoter Committee Members</u></b>	
Barbara C. Lewis Florida Bar No. 118114 <b>THE MOSKOWITZ LAW FIRM, PLLC</b> Continental Plaza 3250 Mary Street, Suite 202 Coconut Grove, FL 33133 Office: (305) 740-1423 barbara@moskowitz-law.com service@moskowitz-law.com	K. Rachel Lanier Alex Brown <b>THE LANIER LAW FIRM, P.C.</b> 10940 W. Sam Houston Pkwy N. Houston, TX 77064 Telephone: (713) 659-5200 Rachel.Lanier@lanierlawfirm.com Alex.Brown@lanierlawfirm.com

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By: /s/ Adam M. Moskowitz  
Adam M. Moskowitz



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

MDL No. 3076  
CASE NO. 1:23-md-03076-KMM

In Re: FTX Cryptocurrency Exchange Collapse Litigation

**NOTICE OF TAKING THE VIDEOTAPED DEPOSITION OF  
DEFENDANT CREATORS AGENCY, LLC'S RULE 30(b)(6) REPRESENTATIVE(S)**

Pursuant to Federal Rule of Civil Procedure 30, Plaintiff's counsel will take the deposition of the below-named person/entity on the date, time, and at the location indicated.

**DEPONENT:** Defendant Creators Agency, LLC, (the "Creators"), by and through Creators' corporate representative(s) with knowledge of the eight topics listed in **Exhibit A**, pursuant to Federal Rule of Civil Procedure 30(b)(6).

**DATE:**

**TIME:**

**LOCATION:** Zoom (contact counsel for details)

The aforesaid deposition will be before a court reporter, an officer authorized by law to administer oaths and take depositions in the State of Florida. The deposition is being taken for the purpose of discovery, for use at trial, or both, or for such other purposes as are permitted under the Federal and Local Rules of Civil Procedure.

Respectfully submitted on November \_\_\_, 2023.

<b><u>Plaintiffs' Co-Lead Counsel</u></b>	
<u>By: /s/ Adam Moskowitz</u> Adam M. Moskowitz Florida Bar No. 984280 Joseph M. Kaye Florida Bar No. 117520 <b>THE MOSKOWITZ LAW FIRM, PLLC</b> Continental Plaza	<u>By: /s/ David Boies</u> David Boies Alex Boies Brooke Alexander <b>BOIES SCHILLER FLEXNER LLP</b> 333 Main Street Armonk, NY 10504

3250 Mary Street, Suite 202 Coconut Grove, FL 33133 Office: (305) 740-1423 adam@moskowitz-law.com joseph@moskowitz-law.com service@moskowitz-law.com	Office: (914) 749-8200 dboies@bsflp.com aboies@bsflp.com balexander@bsflp.com
<b><u>Plaintiffs' Promoter Committee Members</u></b>	
Barbara C. Lewis Florida Bar No. 118114 <b>THE MOSKOWITZ LAW FIRM, PLLC</b> Continental Plaza 3250 Mary Street, Suite 202 Coconut Grove, FL 33133 Office: (305) 740-1423 barbara@moskowitz-law.com service@moskowitz-law.com	K. Rachel Lanier Alex Brown <b>THE LANIER LAW FIRM, P.C.</b> 10940 W. Sam Houston Pkwy N. Houston, TX 77064 Telephone: (713) 659-5200 Rachel.Lanier@lanierlawfirm.com Alex.Brown@lanierlawfirm.com

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on November \_\_\_, 2023, a true and correct copy of the foregoing was served via email to all counsel of record.

By: /s/ Adam M. Moskowitz  
Adam M. Moskowitz

## **EXHIBIT A**

### **I. DEFINITIONS AND INSTRUCTIONS**

Unless otherwise specified, the terms set forth below have the following meanings:

1. “CA,” “You,” or “Your” means Defendant Creators Agency LLC and any of its affiliates, subsidiaries, divisions, segments, predecessors, successors, officers, directors, employees, representatives, or agents.
2. “Co-Defendants” means any of the other Defendants sued in this Action, and any of their affiliates, subsidiaries, divisions, segments, predecessors, successors, officers, directors, employees, representatives, or agents.
3. “FTX Entities” means West Realm Shires Services, Inc., FTX Trading Ltd, Blockfolio, Inc., Alameda Research, LLC, and any of their affiliates, subsidiaries, divisions, segments, predecessors, successors, officers, directors, employees, representatives, or agents.
4. “FTX Platform” refers to the FTX Entities’ mobile application and/or web-based cryptocurrency investment service that places cryptocurrency trade orders on behalf of users.
5. “YBAs” refers to the Yield-Bearing Accounts offered by the FTX Entities on the FTX Platform.
6. “FTT” refers to the native cryptocurrency exchange token of the FTX Platform ecosystem.
7. “Document(s)” means any written, printed, typed or other graphic matter, of any kind or nature, whether in hard copy or electronic format, whether the original, draft, or a copy and copies bearing notations or marks not found on the original, including but not limited to memoranda, reports, recommendations, notes, letters, envelopes, post-its, emails, telegrams, messages, manuscripts, studies, analyses, tests, comparisons, books, articles, pamphlets,

magazines, newspapers, booklets, circulars, bulletins, notices, instructions, minutes, agreements, contracts, and all other written communications, of any type, including inter and intra-office communications, purchase orders, invoices, bills, receipts, questionnaires, surveys, charts, graphs, videos, photographs, sketches, drawings, house sheets, tapes, voice messages or other recordings, print-outs or compilations from which information can be obtained or, if necessary, translated through detection devices into reasonably usable form, including all underlying or preparatory materials and drafts thereof.

8. “Person” or “People” means any natural person(s) or any business, legal, or governmental entity (or entities) or association(s).

9. All/Each – The terms “all” and “each” shall be construed as meaning either all or each as necessary to bring within the scope of the discovery request all responses that might otherwise be construed to be outside its scope.

10. Objections: Where an objection is made to any request, the objection shall state with specificity all grounds. Any ground not stated in an objection within the time provided by the Federal Rules of Civil Procedure, or by the Court’s order, or any extensions thereof, shall be waived.

11. Whenever a reference to a business entity appears, the reference shall mean the business entity, its affiliated companies, partnerships, divisions, subdivisions, directors, officers, employees, agents, clients or other representatives of affiliated third parties.

12. Unless otherwise stated in a request, the time period for which you must respond is beginning in January 1, 2019 and ending at the present time.

## **II. DEPOSITION SUBJECTS**

Pursuant to Rule 30(b)(6), CA shall designate and produce for deposition one or more of its officers, directors, managing agents, or other persons who are knowledgeable about and consent to testify on its behalf concerning the following subject matters:

1. All Documents and responses provided in response to Plaintiffs' requests for production and interrogatories.
2. Contracts or agreements regarding any business You (personally or through any entity owned by You, or any of Your or Your entities' affiliates, representatives, employees, or agents) conducted with the FTX Entities, including any payments made to You (personally or to any entity owned by You, or any of Your or Your entities' affiliates, representatives, employees, or agents) in accordance with any such contract or agreement.
3. All videos or other content You (personally or through any entity owned by You, or any of Your or Your entities' affiliates, representatives, employees, or agents) produced regarding, relating to, and/or mentioning the FTX platform, FTT, and/or YBAs, including videos or content that have been removed from their public-facing platforms.<sup>1</sup>
4. Defendant's "targeting" of Florida audience and Florida's FTX consumers.
5. Your (or Your entities' affiliates, representatives, employees, or agents) promotion of FTT, YBAs or the FTX Platform.

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<sup>1</sup> Any such videos and/or content either should still be saved on Defendant's hard drives and preserved for use in this litigation or should still be on the private-facing portions of their social media platforms—for instance, Defendant could have set a video they posted on YouTube to "private" so it no longer is publicly viewable or searchable but is still posted on their account. "Spoliation is the destruction or significant alteration of evidence, or the failure to preserve property for another's use as evidence in pending or reasonably foreseeable litigation." *Graff v. Baja Marine Corp.*, 310 F. App'x 298, 301 (11th Cir. 2009). "The duty to preserve relevant evidence is triggered not only when litigation is pending, but also when it reasonably foreseeable to that party." *Title Cap. Mgmt., LLC v. Progress Residential, LLC*, No. 16-21882-CV, 2017 WL 5953428, at \*4 (S.D. Fla. Sept. 29, 2017).

6. All due diligence You (personally or through any entity owned by You, or any of Your or Your entities' affiliates, representatives, employees, or agents) conducted before promotion of FTT, YBAs or FTX Platform to the public.

7. This lawsuit and/or the subject matter of this lawsuit.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

MDL No. 3076  
CASE NO. 1:23-md-03076-KMM

In Re: FTX Cryptocurrency Exchange Collapse Litigation

**NOTICE OF TAKING THE VIDEOTAPED DEPOSITION OF  
DEFENDANT ERIKA KULLBERG**

Pursuant to Federal Rule of Civil Procedure 30, Plaintiffs' counsel will take the deposition of the below-named person/entity on the date, time, and at the location indicated.

**DEPONENT:** Defendant Erika Kullberg  
**DATE:**  
**TIME:**  
**LOCATION:** Zoom (contact counsel for details)

The aforesaid deposition will be before a court reporter, an officer authorized by law to administer oaths and take depositions in the State of Florida. The deposition is being taken for the purpose of discovery, for use at trial, or both, or for such other purposes as are permitted under the Federal and Local Rules of Civil Procedure.

Respectfully submitted on November \_\_\_, 2023.

<b><u>Plaintiffs' Co-Lead Counsel</u></b>	
<u>By: /s/ Adam Moskowitz</u> Adam M. Moskowitz Florida Bar No. 984280 Joseph M. Kaye Florida Bar No. 117520 <b>THE MOSKOWITZ LAW FIRM, PLLC</b> Continental Plaza 3250 Mary Street, Suite 202 Coconut Grove, FL 33133 Office: (305) 740-1423 adam@moskowitz-law.com joseph@moskowitz-law.com service@moskowitz-law.com	<u>By: /s/ David Boies</u> David Boies Alex Boies Brooke Alexander <b>BOIES SCHILLER FLEXNER LLP</b> 333 Main Street Armonk, NY 10504 Office: (914) 749-8200 dboies@bsfllp.com aboies@bsfllp.com balexander@bsfllp.com

<b><u>Plaintiffs' Promoter Committee Members</u></b>	
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By: /s/ Adam M. Moskowitz  
Adam M. Moskowitz



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

MDL No. 3076  
CASE NO. 1:23-md-03076-KMM

In Re: FTX Cryptocurrency Exchange Collapse Litigation

**NOTICE OF TAKING THE VIDEOTAPED DEPOSITION OF  
DEFENDANT GOLDEN STATE WARRIORS LLC RULE 30(b)(6)  
REPRESENTATIVE(S)**

Pursuant to Federal Rule of Civil Procedure 30, Plaintiffs' counsel will take the deposition of the below-named person/entity on the date, time, and at the location indicated.

**DEPONENT:** Defendant Golden State Warriors LLC

**DATE:**

**TIME:**

**LOCATION:** Zoom (contact counsel for details)

The aforesaid deposition will be before a court reporter, an officer authorized by law to administer oaths and take depositions in the State of Florida. The deposition is being taken for the purpose of discovery, for use at trial, or both, or for such other purposes as are permitted under the Federal and Local Rules of Civil Procedure.

Respectfully submitted on November \_\_\_, 2023.

**Plaintiffs' Co-Lead Counsel**

By: /s/ Adam Moskowitz  
Adam M. Moskowitz  
Florida Bar No. 984280  
Joseph M. Kaye  
Florida Bar No. 117520  
**THE MOSKOWITZ LAW FIRM, PLLC**  
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By: /s/ David Boies  
David Boies  
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<b><u>Plaintiffs' Promoter Committee Members</u></b>	
Barbara C. Lewis Florida Bar No. 118114 <b>THE MOSKOWITZ LAW FIRM, PLLC</b> Continental Plaza 3250 Mary Street, Suite 202 Coconut Grove, FL 33133 Office: (305) 740-1423 barbara@moskowitz-law.com service@moskowitz-law.com	K. Rachel Lanier Alex Brown <b>THE LANIER LAW FIRM, P.C.</b> 10940 W. Sam Houston Pkwy N. Houston, TX 77064 Telephone: (713) 659-5200 Rachel.Lanier@lanierlawfirm.com Alex.Brown@lanierlawfirm.com

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on November \_\_\_, 2023, a true and correct copy of the foregoing was served via email to all counsel of record.

By: /s/ Adam M. Moskowitz  
Adam M. Moskowitz

## EXHIBIT A

### **I. DEFINITIONS AND INSTRUCTIONS**

Unless otherwise specified, the terms set forth below have the following meanings:

1. “GSW,” “You,” or “Your” means Defendant Golden State Warriors LLC and any of its affiliates, subsidiaries, divisions, segments, predecessors, successors, officers, directors, employees, representatives, or agents.
2. “Co-Defendants” means any of the other Defendants sued in this Action, and any of their affiliates, subsidiaries, divisions, segments, predecessors, successors, officers, directors, employees, representatives, or agents.
3. “FTX Entities” means West Realm Shires Services, Inc., FTX Trading Ltd, Blockfolio, Inc., Alameda Research, LLC, and any of their affiliates, subsidiaries, divisions, segments, predecessors, successors, officers, directors, employees, representatives, or agents.
4. “FTX Platform” refers to the FTX Entities’ mobile application and/or web-based cryptocurrency investment service that places cryptocurrency trade orders on behalf of users.
5. “YBAs” refers to the Yield-Bearing Accounts offered by the FTX Entities on the FTX Platform.
6. “FTT” refers to the native cryptocurrency exchange token of the FTX Platform ecosystem.
7. “Document(s)” means any written, printed, typed or other graphic matter, of any kind or nature, whether in hard copy or electronic format, whether the original, draft, or a copy and copies bearing notations or marks not found on the original, including but not limited to memoranda, reports, recommendations, notes, letters, envelopes, post-its, emails, telegrams, messages, manuscripts, studies, analyses, tests, comparisons, books, articles, pamphlets, magazines, newspapers, booklets, circulars, bulletins, notices, instructions, minutes, agreements, contracts, and all other written communications, of any type, including inter and

intra-office communications, purchase orders, invoices, bills, receipts, questionnaires, surveys, charts, graphs, videos, photographs, sketches, drawings, house sheets, tapes, voice messages or other recordings, print-outs or compilations from which information can be obtained or, if necessary, translated through detection devices into reasonably usable form, including all underlying or preparatory materials and drafts thereof.

8. “Person” or “People” means any natural person(s) or any business, legal, or governmental entity (or entities) or association(s).

9. All/Each – The terms “all” and “each” shall be construed as meaning either all or each as necessary to bring within the scope of the discovery request all responses that might otherwise be construed to be outside its scope.

10. Objections: Where an objection is made to any request, the objection shall state with specificity all grounds. Any ground not stated in an objection within the time provided by the Federal Rules of Civil Procedure, or by the Court’s order, or any extensions thereof, shall be waived.

11. Whenever a reference to a business entity appears, the reference shall mean the business entity, its affiliated companies, partnerships, divisions, subdivisions, directors, officers, employees, agents, clients or other representatives of affiliated third parties.

12. Unless otherwise stated in a request, the time period for which you must respond is beginning in January 1, 2019 and ending at the present time.

## **II. DEPOSITION SUBJECTS**

Pursuant to Rule 30(b)(6), GSW shall designate and produce for deposition one or more of its officers, directors, managing agents, or other persons who are knowledgeable about and consent to testify on its behalf concerning the following subject matters:

1. All Documents and responses provided in response to Plaintiffs' requests for production and interrogatories.
2. Contracts or agreements, regarding any business You (personally or through any entity owned by You, or any of Your or Your entities' affiliates, representatives, employees, or agents) conducted with the FTX Entities, including any payments made to You (personally or to any entity owned by You, or any of Your or Your entities' affiliates, representatives, employees, or agents) in accordance with any such contract or agreement.
3. All content You (personally or through any entity owned by You, or any of Your or Your entities' affiliates, representatives, employees, or agents) produced or generated regarding, relating to, and/or mentioning the FTX platform, FTT, and/or YBAs, including content that may no longer be publicly available.
4. Defendant's "targeting" of Florida audience and Florida's FTX consumers.
5. Your (or Your entities' affiliates, representatives, employees, or agents) promotion of FTT, YBAs or the FTX Platform.
6. All due diligence You (personally or through any entity owned by You, or any of Your or Your entities' affiliates, representatives, employees, or agents) conducted before promotion of FTT, YBAs or FTX Platform to the public.
7. Your sales and revenue generated from advertising and marketing in Florida and/or to Florida consumers.
8. This lawsuit and/or the subject matter of this lawsuit.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

MDL No. 3076  
CASE NO. 1:23-md-03076-KMM

In Re: FTX Cryptocurrency Exchange Collapse Litigation

**NOTICE OF TAKING THE VIDEOTAPED DEPOSITION OF  
DEFENDANT JASPREET SINGH**

Pursuant to Federal Rule of Civil Procedure 30, Plaintiffs' counsel will take the deposition of the below-named person/entity on the date, time, and at the location indicated.

**DEPONENT:** Defendant Jaspreet Singh  
**DATE:**  
**TIME:**  
**LOCATION:** Zoom (contact counsel for details)

The aforesaid deposition will be before a court reporter, an officer authorized by law to administer oaths and take depositions in the State of Florida. The deposition is being taken for the purpose of discovery, for use at trial, or both, or for such other purposes as are permitted under the Federal and Local Rules of Civil Procedure.

Respectfully submitted on November \_\_\_, 2023.

**Plaintiffs' Co-Lead Counsel**

By: /s/ Adam Moskowitz  
Adam M. Moskowitz  
Florida Bar No. 984280  
Joseph M. Kaye  
Florida Bar No. 117520  
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By: /s/ David Boies  
David Boies  
Alex Boies  
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<b><u>Plaintiffs' Promoter Committee Members</u></b>	
Barbara C. Lewis Florida Bar No. 118114 <b>THE MOSKOWITZ LAW FIRM, PLLC</b> Continental Plaza 3250 Mary Street, Suite 202 Coconut Grove, FL 33133 Office: (305) 740-1423 barbara@moskowitz-law.com service@moskowitz-law.com	K. Rachel Lanier Alex Brown <b>THE LANIER LAW FIRM, P.C.</b> 10940 W. Sam Houston Pkwy N. Houston, TX 77064 Telephone: (713) 659-5200 Rachel.Lanier@lanierlawfirm.com Alex.Brown@lanierlawfirm.com

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on November \_\_\_, 2023, a true and correct copy of the foregoing was served via email to all counsel of record.

By: /s/ Adam M. Moskowitz  
Adam M. Moskowitz

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

MDL No. 3076  
CASE NO. 1:23-md-03076-KMM

In Re: FTX Cryptocurrency Exchange Collapse Litigation

**NOTICE OF TAKING THE VIDEOTAPED DEPOSITION OF**  
**DEFENDANT JEREMY LEFEBVRE**

Pursuant to Federal Rule of Civil Procedure 30, Plaintiffs' counsel will take the deposition of the below-named person/entity on the date, time, and at the location indicated.

**DEPONENT:** Defendant Jeremy LeFebvre

**DATE:**

**TIME:**

**LOCATION:** Zoom (contact counsel for details)

The aforesaid deposition will be before a court reporter, an officer authorized by law to administer oaths and take depositions in the State of Florida. The deposition is being taken for the purpose of discovery, for use at trial, or both, or for such other purposes as are permitted under the Federal and Local Rules of Civil Procedure.

Respectfully submitted on November \_\_\_, 2023.

**Plaintiffs' Co-Lead Counsel**

By: /s/ Adam Moskowitz  
Adam M. Moskowitz  
Florida Bar No. 984280  
Joseph M. Kaye  
Florida Bar No. 117520  
**THE MOSKOWITZ LAW FIRM, PLLC**  
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By: /s/ David Boies  
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<b><u>Plaintiffs' Promoter Committee Members</u></b>	
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I HEREBY CERTIFY that on November \_\_\_, 2023, a true and correct copy of the foregoing was served via email to all counsel of record.

By: /s/ Adam M. Moskowitz  
Adam M. Moskowitz

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
MDL No. 3076  
CASE NO. 1:23-md-03076-KMM**

In Re: FTX Cryptocurrency Exchange Collapse Litigation

**NOTICE OF TAKING THE VIDEOTAPED DEPOSITION OF  
DEFENDANT LAWRENCE GENE DAVID**

Pursuant to Federal Rule of Civil Procedure 30, Plaintiffs' counsel will take the deposition of the below-named person/entity on the date, time, and at the location indicated.

**DEPONENT:** Defendant Lawrence Gene David

**DATE:**

**TIME:**

**LOCATION:** Zoom (contact counsel for details)

The aforesaid deposition will be before a court reporter, an officer authorized by law to administer oaths and take depositions in the State of Florida. The deposition is being taken for the purpose of discovery, for use at trial, or both, or for such other purposes as are permitted under the Federal and Local Rules of Civil Procedure.

Respectfully submitted on November \_\_\_, 2023.

<b><u>Plaintiffs' Co-Lead Counsel</u></b>	
<u>By: /s/ Adam Moskowitz</u> Adam M. Moskowitz Florida Bar No. 984280 Joseph M. Kaye Florida Bar No. 117520 <b>THE MOSKOWITZ LAW FIRM, PLLC</b> Continental Plaza 3250 Mary Street, Suite 202 Coconut Grove, FL 33133 Office: (305) 740-1423	<u>By: /s/ David Boies</u> David Boies Alex Boies Brooke Alexander <b>BOIES SCHILLER FLEXNER LLP</b> 333 Main Street Armonk, NY 10504 Office: (914) 749-8200 dboies@bsfllp.com aboies@bsfllp.com

adam@moskowitz-law.com joseph@moskowitz-law.com service@moskowitz-law.com	balexander@bsflp.com
<b><u>Plaintiffs' Promoter Committee Members</u></b>	
Barbara C. Lewis Florida Bar No. 118114 <b>THE MOSKOWITZ LAW FIRM, PLLC</b> Continental Plaza 3250 Mary Street, Suite 202 Coconut Grove, FL 33133 Office: (305) 740-1423 barbara@moskowitz-law.com service@moskowitz-law.com	K. Rachel Lanier Alex Brown <b>THE LANIER LAW FIRM, P.C.</b> 10940 W. Sam Houston Pkwy N. Houston, TX 77064 Telephone: (713) 659-5200 Rachel.Lanier@lanierlawfirm.com Alex.Brown@lanierlawfirm.com

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I HEREBY CERTIFY that on November \_\_\_, 2023, a true and correct copy of the foregoing was served via email to all counsel of record.

By: /s/ Adam M. Moskowitz  
Adam M. Moskowitz

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

MDL No. 3076  
CASE NO. 1:23-md-03076-KMM

In Re: FTX Cryptocurrency Exchange Collapse Litigation

**NOTICE OF TAKING THE VIDEOTAPED DEPOSITION OF**  
**DEFENDANT NAOMI OSAKA**

Pursuant to Federal Rule of Civil Procedure 30, Plaintiffs' counsel will take the deposition of the below-named person/entity on the date, time, and at the location indicated.

**DEPONENT:** Defendant Naomi Osaka

**DATE:**

**TIME:**

**LOCATION:** Zoom (contact counsel for details)

The aforesaid deposition will be before a court reporter, an officer authorized by law to administer oaths and take depositions in the State of Florida. The deposition is being taken for the purpose of discovery, for use at trial, or both, or for such other purposes as are permitted under the Federal and Local Rules of Civil Procedure.

Respectfully submitted on November \_\_\_, 2023.

**Plaintiffs' Co-Lead Counsel**

By: /s/ Adam Moskowitz

Adam M. Moskowitz  
Florida Bar No. 984280  
Joseph M. Kaye  
Florida Bar No. 117520  
**THE MOSKOWITZ LAW FIRM, PLLC**  
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By: /s/ David Boies

David Boies  
Alex Boies  
Brooke Alexander  
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<b><u>Plaintiffs' Promoter Committee Members</u></b>	
Barbara C. Lewis Florida Bar No. 118114 <b>THE MOSKOWITZ LAW FIRM, PLLC</b> Continental Plaza 3250 Mary Street, Suite 202 Coconut Grove, FL 33133 Office: (305) 740-1423 barbara@moskowitz-law.com service@moskowitz-law.com	K. Rachel Lanier Alex Brown <b>THE LANIER LAW FIRM, P.C.</b> 10940 W. Sam Houston Pkwy N. Houston, TX 77064 Telephone: (713) 659-5200 Rachel.Lanier@lanierlawfirm.com Alex.Brown@lanierlawfirm.com

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By: /s/ Adam M. Moskowitz  
Adam M. Moskowitz

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

MDL No. 3076  
CASE NO. 1:23-md-03076-KMM

In Re: FTX Cryptocurrency Exchange Collapse Litigation

**NOTICE OF TAKING THE VIDEOTAPED DEPOSITION OF  
DEFENDANT SOLOMID CORP. RULE 30(b)(6) REPRESENTATIVE(S)**

Pursuant to Federal Rule of Civil Procedure 30, Plaintiffs' counsel will take the deposition of the below-named person/entity on the date, time, and at the location indicated.

**DEPONENT:** Defendant Solomid Corp. by and through Solomid Corp.' corporate representative(s) with knowledge of the eight topics listed in **Exhibit A**, pursuant to Federal Rule of Civil Procedure 30(b)(6).

**DATE:**

**TIME:**

**LOCATION:** Zoom (contact counsel for details)

The aforesaid deposition will be before a court reporter, an officer authorized by law to administer oaths and take depositions in the State of Florida. The deposition is being taken for the purpose of discovery, for use at trial, or both, or for such other purposes as are permitted under the Federal and Local Rules of Civil Procedure.

Respectfully submitted on November \_\_\_, 2023.

<b><u>Plaintiffs' Co-Lead Counsel</u></b>	
<u>By: /s/ Adam Moskowitz</u> Adam M. Moskowitz Florida Bar No. 984280 Joseph M. Kaye Florida Bar No. 117520 <b>THE MOSKOWITZ LAW FIRM, PLLC</b> Continental Plaza 3250 Mary Street, Suite 202 Coconut Grove, FL 33133	<u>By: /s/ David Boies</u> David Boies Alex Boies Brooke Alexander <b>BOIES SCHILLER FLEXNER LLP</b> 333 Main Street Armonk, NY 10504 Office: (914) 749-8200 dboies@bsfllp.com

Office: (305) 740-1423 adam@moskowitz-law.com joseph@moskowitz-law.com service@moskowitz-law.com	aboies@bsflp.com balexander@bsflp.com
<b><u>Plaintiffs' Promoter Committee Members</u></b>	
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By: /s/ Adam M. Moskowitz  
Adam M. Moskowitz

## **EXHIBIT A**

### **I. DEFINITIONS AND INSTRUCTIONS**

Unless otherwise specified, the terms set forth below have the following meanings:

1. “Solomid,” “You,” or “Your” means Defendant Solomid Corp. and any of its affiliates, subsidiaries, divisions, segments, predecessors, successors, officers, directors, employees, representatives, or agents.
2. “Co-Defendants” means any of the other Defendants sued in this Action, and any of their affiliates, subsidiaries, divisions, segments, predecessors, successors, officers, directors, employees, representatives, or agents.
3. “FTX Entities” means West Realm Shires Services, Inc., FTX Trading Ltd, Blockfolio, Inc., Alameda Research, LLC, and any of their affiliates, subsidiaries, divisions, segments, predecessors, successors, officers, directors, employees, representatives, or agents.
4. “FTX Platform” refers to the FTX Entities’ mobile application and/or web-based cryptocurrency investment service that places cryptocurrency trade orders on behalf of users.
5. “YBAs” refers to the Yield-Bearing Accounts offered by the FTX Entities on the FTX Platform.
6. “FTT” refers to the native cryptocurrency exchange token of the FTX Platform ecosystem.
7. “Document(s)” means any written, printed, typed or other graphic matter, of any kind or nature, whether in hard copy or electronic format, whether the original, draft, or a copy and copies bearing notations or marks not found on the original, including but not limited to memoranda, reports, recommendations, notes, letters, envelopes, post-its, emails, telegrams, messages, manuscripts, studies, analyses, tests, comparisons, books, articles, pamphlets,



magazines, newspapers, booklets, circulars, bulletins, notices, instructions, minutes, agreements, contracts, and all other written communications, of any type, including inter and intra-office communications, purchase orders, invoices, bills, receipts, questionnaires, surveys, charts, graphs, videos, photographs, sketches, drawings, house sheets, tapes, voice messages or other recordings, print-outs or compilations from which information can be obtained or, if necessary, translated through detection devices into reasonably usable form, including all underlying or preparatory materials and drafts thereof.

8. “Person” or “People” means any natural person(s) or any business, legal, or governmental entity (or entities) or association(s).

9. All/Each – The terms “all” and “each” shall be construed as meaning either all or each as necessary to bring within the scope of the discovery request all responses that might otherwise be construed to be outside its scope.

10. Objections: Where an objection is made to any request, the objection shall state with specificity all grounds. Any ground not stated in an objection within the time provided by the Federal Rules of Civil Procedure, or by the Court’s order, or any extensions thereof, shall be waived.

11. Whenever a reference to a business entity appears, the reference shall mean the business entity, its affiliated companies, partnerships, divisions, subdivisions, directors, officers, employees, agents, clients or other representatives of affiliated third parties.

12. Unless otherwise stated in a request, the time period for which you must respond is beginning in January 1, 2019 and ending at the present time.

## **II. DEPOSITION SUBJECTS**

Pursuant to Rule 30(b)(6), Solomid shall designate and produce for deposition one or more of its officers, directors, managing agents, or other persons who are knowledgeable about and consent to testify on its behalf concerning the following subject matters:

1. All Documents and responses provided in response to Plaintiffs' requests for production and interrogatories.
2. Contracts or agreements, regarding any business You (personally or through any entity owned by You, or any of Your or Your entities' affiliates, representatives, employees, or agents) conducted with the FTX Entities, including any payments made to You (personally or to any entity owned by You, or any of Your or Your entities' affiliates, representatives, employees, or agents) in accordance with any such contract or agreement.
3. All content You (personally or through any entity owned by You, or any of Your or Your entities' affiliates, representatives, employees, or agents) produced or generated regarding, relating to, and/or mentioning the FTX platform, FTT, and/or YBAs, including content that may no longer be publicly available.
4. Defendant's "targeting" of Florida audience and Florida's FTX consumers.
5. Your (or Your entities' affiliates, representatives, employees, or agents) promotion of FTT, YBAs or the FTX Platform.
6. All due diligence You (personally or through any entity owned by You, or any of Your or Your entities' affiliates, representatives, employees, or agents) conducted before promotion of FTT, YBAs or FTX Platform to the public.
7. Your sales and revenue generated from advertising and marketing in Florida and/or to Florida consumers.
8. This lawsuit and/or the subject matter of this lawsuit.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

MDL No. 3076  
CASE NO. 1:23-md-03076-KMM

In Re: FTX Cryptocurrency Exchange Collapse Litigation

**NOTICE OF TAKING THE VIDEOTAPED DEPOSITION OF**  
**DEFENDANT STEPHEN CURRY**

Pursuant to Federal Rule of Civil Procedure 30, Plaintiffs' counsel will take the deposition of the below-named person/entity on the date, time, and at the location indicated.

**DEPONENT:** Defendant Stephen Curry

**DATE:**

**TIME:**

**LOCATION:** Zoom (contact counsel for details)

The aforesaid deposition will be before a court reporter, an officer authorized by law to administer oaths and take depositions in the State of Florida. The deposition is being taken for the purpose of discovery, for use at trial, or both, or for such other purposes as are permitted under the Federal and Local Rules of Civil Procedure.

Respectfully submitted on November \_\_\_, 2023.

**Plaintiffs' Co-Lead Counsel**

By: /s/ Adam Moskowitz  
Adam M. Moskowitz  
Florida Bar No. 984280  
Joseph M. Kaye  
Florida Bar No. 117520  
**THE MOSKOWITZ LAW FIRM, PLLC**  
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joseph@moskowitz-law.com  
service@moskowitz-law.com

By: /s/ David Boies  
David Boies  
Alex Boies  
Brooke Alexander  
**BOIES SCHILLER FLEXNER LLP**  
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<b><u>Plaintiffs' Promoter Committee Members</u></b>	
Barbara C. Lewis Florida Bar No. 118114 <b>THE MOSKOWITZ LAW FIRM, PLLC</b> Continental Plaza 3250 Mary Street, Suite 202 Coconut Grove, FL 33133 Office: (305) 740-1423 barbara@moskowitz-law.com service@moskowitz-law.com	K. Rachel Lanier Alex Brown <b>THE LANIER LAW FIRM, P.C.</b> 10940 W. Sam Houston Pkwy N. Houston, TX 77064 Telephone: (713) 659-5200 Rachel.Lanier@lanierlawfirm.com Alex.Brown@lanierlawfirm.com

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on November \_\_\_, 2023, a true and correct copy of the foregoing was served via email to all counsel of record.

By: /s/ Adam M. Moskowitz  
Adam M. Moskowitz

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
MDL No. 3076  
CASE NO. 1:23-md-03076-KMM**

In Re: FTX Cryptocurrency Exchange Collapse Litigation

**NOTICE OF TAKING THE VIDEOTAPED DEPOSITION OF  
DEFENDANT UDONIS HASLEM**

Pursuant to Federal Rule of Civil Procedure 30, Plaintiffs' counsel will take the deposition of the below-named person/entity on the date, time, and at the location indicated.

**DEPONENT:** Defendant Udonis Haslem  
**DATE:**  
**TIME:**  
**LOCATION:** Zoom (contact counsel for details)

The aforesaid deposition will be before a court reporter, an officer authorized by law to administer oaths and take depositions in the State of Florida. The deposition is being taken for the purpose of discovery, for use at trial, or both, or for such other purposes as are permitted under the Federal and Local Rules of Civil Procedure.

Respectfully submitted on November \_\_\_, 2023.

<b><u>Plaintiffs' Co-Lead Counsel</u></b>	
<u>By: /s/ Adam Moskowitz</u> Adam M. Moskowitz Florida Bar No. 984280 Joseph M. Kaye Florida Bar No. 117520 <b>THE MOSKOWITZ LAW FIRM, PLLC</b> Continental Plaza 3250 Mary Street, Suite 202 Coconut Grove, FL 33133 Office: (305) 740-1423 adam@moskowitz-law.com joseph@moskowitz-law.com service@moskowitz-law.com	<u>By: /s/ David Boies</u> David Boies Alex Boies Brooke Alexander <b>BOIES SCHILLER FLEXNER LLP</b> 333 Main Street Armonk, NY 10504 Office: (914) 749-8200 dboies@bsfllp.com aboies@bsfllp.com balexander@bsfllp.com

<b><u>Plaintiffs' Promoter Committee Members</u></b>	
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By: /s/ Adam M. Moskowitz  
Adam M. Moskowitz

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

MDL No. 3076  
CASE NO. 1:23-md-03076-KMM

In Re: FTX Cryptocurrency Exchange Collapse Litigation

**NOTICE OF TAKING THE VIDEOTAPED DEPOSITION OF**  
**DEFENDANT GRAHAM STEPHAN**

Pursuant to Federal Rule of Civil Procedure 30, Plaintiffs' counsel will take the deposition of the below-named person/entity on the date, time, and at the location indicated.

**DEPONENT:** Defendant Graham Stephan  
**DATE:**  
**TIME:**  
**LOCATION:** Zoom (contact counsel for details)

The aforesaid deposition will be before a court reporter, an officer authorized by law to administer oaths and take depositions in the State of Florida. The deposition is being taken for the purpose of discovery, for use at trial, or both, or for such other purposes as are permitted under the Federal and Local Rules of Civil Procedure.

Respectfully submitted on November \_\_\_, 2023.

<b><u>Plaintiffs' Co-Lead Counsel</u></b>	
<u>By: /s/ Adam Moskowitz</u> Adam M. Moskowitz Florida Bar No. 984280 Joseph M. Kaye Florida Bar No. 117520 <b>THE MOSKOWITZ LAW FIRM, PLLC</b> Continental Plaza 3250 Mary Street, Suite 202 Coconut Grove, FL 33133 Office: (305) 740-1423 adam@moskowitz-law.com joseph@moskowitz-law.com service@moskowitz-law.com	<u>By: /s/ David Boies</u> David Boies Alex Boies Brooke Alexander <b>BOIES SCHILLER FLEXNER LLP</b> 333 Main Street Armonk, NY 10504 Office: (914) 749-8200 dboies@bsfllp.com aboies@bsfllp.com balexander@bsfllp.com

<b><u>Plaintiffs' Promoter Committee Members</u></b>	
Barbara C. Lewis Florida Bar No. 118114 <b>THE MOSKOWITZ LAW FIRM, PLLC</b> Continental Plaza 3250 Mary Street, Suite 202 Coconut Grove, FL 33133 Office: (305) 740-1423 barbara@moskowitz-law.com service@moskowitz-law.com	K. Rachel Lanier Alex Brown <b>THE LANIER LAW FIRM, P.C.</b> 10940 W. Sam Houston Pkwy N. Houston, TX 77064 Telephone: (713) 659-5200 Rachel.Lanier@lanierlawfirm.com Alex.Brown@lanierlawfirm.com

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on November \_\_, 2023, a true and correct copy of the foregoing was served via email to all counsel of record.

By: /s/ Adam M. Moskowitz  
Adam M. Moskowitz